

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

REBECCA SAVEAL,

Plaintiff,

v.

THE KROGER CO; KROGER
TEXAS L.P; and DOES 1-10

Defendants.

CASE NO. 3:21-cv-02822

**MOTION AND [PROPOSED]
ORDER ALLOWING THE
WITHDRAWAL OF
PLAINTIFF'S
COUNSEL**

PLEASE TAKE NOTICE that the undersigned attorney of record for Plaintiff, Rebecca Saveal (hereinafter Ms. Saveal), respectfully requests that this Court enter an order granting leave for Attorney Keith Altman to withdraw as counsel for Ms. Saveal. This **MOTION AND [PROPOSED] ORDER ALLOWING THE WITHDRAWAL OF PLAINTIFF'S COUNSEL** is based upon the following information, and Attorney Keith Altman hereby states:

1. On November 12, 2021, Ms. Saveal commenced this action through undersigned counsel - Keith Altman.

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2. On January 21, 2022, Attorney Altman's motion to appear in this action *Pro Hac Vice* was granted.
3. In December 2021, Attorney Altman was declared legally blind in both eyes. This permanent medical condition was sudden. Attorney Altman's condition worsened over just a few months. Please see the attached letter from Attorney Altman's physician.
4. In and around January 2022, Attorney Altman lost significant staffing in his firm. Both an attorney and two paralegals left his employ in a very short timeframe. These had been employees brought in to help accommodate Attorney Altman's disability.
5. Attorney Altman has been attempting to add staff but finding proper professionals suiting the necessary requirements continues to prove challenging and time-consuming.
6. During this time, there has also been a significant breakdown in the attorney-client relationship between Attorney Altman and Ms. Saveal with respect to the handling of her case.
7. Ms. Saveal has been given verbal and written notice that Attorney Altman intends to withdraw as her counsel of record.

8. Due to Attorney Altman's poor health and his lack of the adequate staffing and resources needed to properly accommodate for his poor health coupled with the breakdown of his attorney-client relationship with Ms. Saveal, Attorney Altman is unable to continue effectively and properly representing her.
9. As such, Attorney Altman respectfully requests that this Court enter an order allowing for his withdrawal from this case as well as a stay of this matter as it pertains to Ms. Saveal of at least sixty (60) days to allow her to retain new counsel.

WHEREFORE, upon hearing hereof, the undersigned Attorney Altman prays that this Court enters an order allowing for his withdrawal from representing Ms. Saveal in this matter.

Dated: March 14, 2022

Respectfully Submitted,



Keith Altman, Esq.
The Law Office of Keith Altman
33228 West 12 Mile Road - Suite 375
Farmington Hills, Michigan 48334
Telephone: (248) 987-8929
keithaltman@kaltmanlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby states that on March 14, 2022, he caused the forgoing **MOTION AND [PROPOSED]ORDER ALLOWING THE WITHDRAWAL OF PLAINTIFF'S COUNSEL** to be filed electronically with the United States District Court and that a copy of said document was mailed to the Plaintiff via U.S. Certified/Return Receipt Mail:

Rebecca Saveal
704 Westgate Court
Anna, Texas 75409

A handwritten signature in black ink, appearing to read 'Keith Altman', written over a horizontal line.

Keith Altman, Esq.



East China 248-288-2280
Fort Gratiot 248-288-2280
Gaylord 989-448-0937
Grand Rapids 616-942-2406

Livonia 734-464-2300
Muskegon 231-733-7832
Petoskey 231-439-9230
Port Huron 248-652-7400
Rochester 248-652-7400

St. Clair Shores 586-552-2092
Traverse City 231-938-0710
Wyandotte 734-720-0906
Ypsilanti 734-572-1200

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Michael T. Trese, M.D. • George A. Williams, M.D. • Tarek S. Hassan, M.D. • Bruce R. Garretson, M.D. • Alan R. Margherio, M.D. • A. Bawa Dass, M.D.
Alan J. Ruby, M.D. • Paul V. Raphaelian, M.D. • Antonio Capone, Jr., M.D. • Sunita Yedavally, D.O. • Kimberly A. Drenser, M.D., Ph.D.
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Tamer H. Mahmoud, M.D., Ph.D. • Diane K. Fiander, M.D. • Nathan D. Farley, M.D.

To Whom It May Concern:

Keith Altman has been known to our practice (Associated Retinal Consultants) and under our care since July 8, 2021. Due to bilateral ischemic optic neuropathy (ICD-10: H47.013), patient is legally blind.

This vision loss has profoundly affected my patient's ability to care for himself and he now requires assistant with activities of daily living including seeing, eating, walking, and caring for oneself.

In short, it is my medical recommendation that this patient be entitled to all the benefits and privileges pertaining to the visual impaired. It is my professional opinion that this individual meets Social Security criteria for disability given vision loss. Please do not hesitate to contact me with any further questions or concerns.

Thank you for your assistance with the care for my patient.

Best,

Margaret M. Runner, MD
Fellow, Vitreoretinal Surgery and Diseases
Associated Retinal Consultants, P.C. / William Beaumont Hospital

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Beaumont
Urgent Care
BY *WellStreet*

BEAUMONT URGENT CARE BY WELLSTREET, FARMINGTON HILLS NORTH
29263 ORCHARD LAKE RD
FARMINGTON HILLS MI 48334-2953
Phone: 248-488-5900
Fax: 248-488-5903

November 11, 2021

Patient: **Keith Altman**
Date of Birth: **10/19/1968**
Date of Visit: **11/11/2021**

To Whom It May Concern:

It is my medical opinion that Keith Altman be allowed to uncover his nose in order to use his medically necessary BiPAP machine while he sleeps.

If you have any questions or concerns, please don't hesitate to call.

Sincerely,



Kendal E Gluck, MD

CC: No Recipients